

**RCRA Compliance Enforcement Generator Inspection Report**

**Facility Name:** Fordham University

**EPA I.D. No.:** NYR000070474

**Facility Address:** 150 West 62<sup>nd</sup> St, New York, NY 10023

**Main EHS Contact:** Roger Slattery, (718) 817-5829, located at Rose Hill (Bronx) Campus

**Facility Representative(s):** Jedd Applebaum, Chief Engineer (by phone)  
Frank Puppola, Watch Engineer (accompanied inspector)

**Inspection Date:** Thurs. September 5, 2013

**EPA Inspector:** Steven T. Petrucelli, Environmental Engineer

**Inspector Signature:** 

**Date of Report:** 12/3/13

**Entry Procedures Followed (presented credentials & explained authority/purpose/CBI/etc.):** ☒ Y ☐ N

**Purpose of Inspection:** general CEI of a never-inspected LQG

**Description of Facility:** college/university – classrooms, labs, art/photo studio and dorms

**Waste Generating Processes, Waste Codes, and Amounts:**

**Total Hazardous Waste Quantity per month in Kg:** <5kg avg, except for lead-contaminated soil from excavation for construction in the winter/spring 2011 and a one-time P-waste generation in May 2013

**Facility Type:** Non-notifier CESQG SQG ☒ LQG Transporter  
TSDF SQHUW LQHUW Non-handler Closed

**Exemptions and Permits:** N/A

**List of Operations and Areas Inspected:** maintenance operations, art and photo studio, labs

**Multimedia Checklist:** No referrals indicated (therefore not attached)

**The Generator Checklist follows.**

**Attachments:** Manifest data for January 2009 through the inspection



## Generator Checklist

Facility Name:

Y: In Compliance

N: Not in Compliance

NA: Not Applicable

Waste ID:

Requirement	Y	N	NA
Waste ID - Knowledge	X		
Waste ID - Analysis	X		

Satellite Accumulation Areas:

Requirement	Y	N	NA
Labeling	X		
Closed container	X		
≤ 55 gallons	X		
Container condition	X		
Container management	X		
Compatibility	X		

90/180-Day Container Areas:

Requirement	Y	N	NA
Labeling	X		
Accumulation time	X		
DOT containers	X		
Container condition	X		
Aisle space	X		
Compatibility	X		
Weekly inspections	X		
50-ft buffer	X		
Signs and emergency postings	X		
Treatment in container	X		

90/180-Day Tank Areas: (Not Applicable)

Requirement	Y	N	NA
Labeling			
Accumulation time			
Tank integrity			
Tank design			
Containment			
Release detection			
Daily inspection			
Response to leaks and spills			
Ignitable/Reactive			
Compatibility			
Tank condition			

Requirement	Y	N	NA
Treatment in tank			

Manifests/LDRs:

Requirement	Y	N	NA
3 years all complete	X		
TSD return copy	X		
Exception reports	X		
Biennial reports	X		
Exception notification	X		

Training:

Requirement	Y	N	NA
Name and job title	X		
Job description	X		
Training plan	X		
Training completed	X		
Training timely	X		
Training records	X		

Preparedness and Prevention:

Requirement	Y	N	NA
Maintenance and operation of facility	X		
Required equipment present and tested	X		
Communication and alarm system	X		
Arrangements with local authorities	X		

Contingency Plan:

Requirement	Y	N	NA
Complete	X		
Distributed	X		
Implemented	X		
Emergency	X		
Up to date	X		

Universal Waste:

Requirement	Y	N	NA
Waste management	X		
Labels and marking	X		
Accumulation time	X		
Response to releases	X		
Tracking	X		
Exports	X		

If any "N" is checked, a detailed narrative report must be attached to this checklist describing the violation and close-out briefing to support enforcement follow-up.

Additional Notes: see attached notes



- I was escorted around the facility by Frank Puppola, Watch Engineer, but spoke with Jedd Applebaum, Chief Engineer, by phone during the inspection. Mr. Applebaum was not at the facility at the time but was more familiar with waste management activities.
- The photo lab appeared to generate the most chemical waste. The waste was collected in segregated, labeled carboys with disposal and recycling procedures in place for each material. However, little if any was hazardous. Sink drains in the photo lab were all run through a trap (30 gallon poly drum.)
- Waste is removed is removed directly from the SAA rather than by facility staff or through a separate storage area.
- The only lab class at this location is freshman biology, which does not routinely generate hazardous waste. All other lab classes are conducted at the Rose Hill (Bronx) campus.
- Hazardous waste is managed through the Safety and Security office at the Rose Hill Campus. Roger Slattery is the contact.
- The facility would have been a CESQG since at least 2009 (earliest manifests reviewed) based on its typical waste streams generated, but was an LQG in 2011 due to construction that involved excavation of lead-contaminated soil and in 2014 from a one-time cleanout that generated over 10 pounds of P-waste. Mr. Applebaum did not know of any lead-based paint present.
- The facility appeared to have waste ID procedures in place, facility personnel encountered knew who to contact for assistance with hazardous waste/hazardous materials, emergency procedures and waste management SOPs appeared to be followed, and emergency equipment was readily available and appeared to be maintained.



Manifests 2009-2013

Fordham University - Lincoln Center

Manifest	Item	Generator-ID	Gen-Signed	TSD	TSD-Signed	#Cont	ContType	Qty	Units	Mass (lbs)	Code1	Code2	Code3	Code4
005294150JJK	1	NYR000070474	06/01/09	PAD067098822	06/10/09	1	DF	15	P	15	D001	D002	D011	
005294150JJK	2	NYR000070474	06/01/09	PAD067098822	06/10/09	1	DF	1	P	1	D001			
005294150JJK	3	NYR000070474	06/01/09	PAD067098822	06/10/09	1	DF	1	P	1	D003	P098		
005294150JJK	4	NYR000070474	06/01/09	PAD067098822	06/10/09	1	DF	5	P	5	D001	D002	U123	
005294150JJK	5	NYR000070474	06/01/09	PAD067098822	06/10/09	1	CF	45	P	45	D001	F003	U055	
002104225JJK	1	NYR000070474	04/01/10	MAD980915755	04/02/10	4	DM	2800	P	2800	D009			
006531736JJK	1	NYR000070474	06/10/10	PAD067098822	06/22/10	1	DF	1	P	1	D001			
006531736JJK	2	NYR000070474	06/10/10	PAD067098822	06/22/10	1	DF	1	P	1	D001	D002		
006531736JJK	3	NYR000070474	06/10/10	PAD067098822	06/22/10	1	CF	29	P	29	D001	F003		
006531736JJK	4	NYR000070474	06/10/10	PAD067098822	06/22/10	1	DF	1	P	1	U007	U236		
006531736JJK	5	NYR000070474	06/10/10	PAD067098822	06/22/10	1	DF	1	P	1	D002			
006531736JJK	6	NYR000070474	06/10/10	PAD067098822	06/22/10	1	CF	15	P	15	D002	D006		
006377953JJK	1	NYR000070474	04/26/11	NYD049836679	04/27/11	1	DT	25392	K	55980	D008	B007		
006377955JJK	1	NYR000070474	04/26/11	NYD049836679	04/27/11	1	DT	25682	K	56619	D008	B007		
006377956JJK	1	NYR000070474	04/26/11	NYD049836679	04/27/11	1	DT	21164	K	46659	D008	B007		
008468372JJK	1	NYR000070474	05/17/11	PAD067098822	05/26/11	1	DF	1	P	1	D001	D002		
008468372JJK	2	NYR000070474	05/17/11	PAD067098822	05/26/11	1	DF	4	P	4	D002	U188		
008468372JJK	3	NYR000070474	05/17/11	PAD067098822	05/26/11	1	DF	9	P	9	D001	D011		
008468372JJK	4	NYR000070474	05/17/11	PAD067098822	05/26/11	1	DF	3	P	3	F005	D001	D007	D022
008468372JJK	5	NYR000070474	05/17/11	PAD067098822	05/26/11	1	DM	1	P	1	D003	P106		
010101080JJK	1	NYR000070474	05/15/12	PAD067098822	05/21/12	1	DF	2	P	2	D002			
010101080JJK	2	NYR000070474	05/15/12	PAD067098822	05/21/12	1	DF	24	P	24	D001	U002	F003	
010101080JJK	3	NYR000070474	05/15/12	PAD067098822	05/21/12	1	DF	9	P	9	D010			
010982831JJK	1	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	2	P	2	D002			
010982831JJK	2	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	4	P	4	D001			
010982831JJK	3	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	3	P	3	D001	P002	D007	
010982831JJK	4	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	1	P	1	D009			
010982831JJK	5	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	10	P	10	P204	U061	D002	D007
010982831JJK	6	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	11	P	11	D002			
010982831JJK	7	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	40	P	40	D001	F003	D007	
010982831JJK	8	NYR000070474	05/20/13	PAD067098822	05/31/13	1	DF	1	P	1	D001	D002		